VICTORIA L. NEAL, ESQ. Nevada Bar No.: 13382 KEMP & KEMP 7435 W. Azure Drive, Suite 110 3 Las Vegas, NV 89130 702-258-1183 ph /702-258-6983 fax 4 vneal@kemp-attorneys.com 5 Attorney for Defendant Arnaldo Trabucco, M.D. 6 7 8 9 10 11 JEFFREY A. COGAN, an individual; and JEFFREY A. COGAN, ESQ., LTD., a revoked 12 Nevada corporation; 13 Plaintiffs, 14 v. 15 16 17

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Case No.: 2:21-cv-02087-APG-EJY

STIPULATION RE: EXTENSION OF TIME FOR DEFENDANT ARNALDO TRABUCCO, M.D. TO FILE A RESPONSIVE PLEADING TO **COMPLAINT**

ARNALDO TRABUCCO, M.D., an individual, Defendant.

The parties, Defendant Arnaldo Trabucco, M.D., (hereinafter "Defendant"), by and through undersigned counsel, and Plaintiffs Jeffrey A. Cogan, an individual, and Jeffrey A. Cogan, Esq., Ltd., a Nevada revoked corporation (hereinafter "Plaintiffs"), hereby stipulate to an extension of time for Defendant to respond to the Complaint filed in this matter [ECF No. 1].

On November 20, 2021, a Complaint was filed in this matter. A Summons was issued on November 22, 2021 [Doc. 3]. Undersigned counsel accepted service of the initial documents on December 9, 2021. A responsive pleading is due to this Court on December 30, 2021.

Undersigned counsel is in the process of obtaining local counsel in Nevada. Unfortunately, with the holidays, it has been difficult to obtain counsel and complete the responsive pleading. It is for this reason counsel request an extension to file the responsive pleading.

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Mr. Wilenchik contacted Mr. Cogan regarding an extension to file the responsive 1 pleading. The parties stipulate that Defendants shall file their responsive pleading by January 2 21, 2022. 3 Further, counsel for Defendant, Wilenchik & Bartness will be filing a Petition for 4 Permission to Practice in this Case only by Attorney not Admitted to the Bar of this court and 5 Designation of Local Counsel. 6 DATED this 21st day of January 2022. 7 JEFFREY A. COGAN CHARTERED, 8 a Professional Limited Liability Company 9 /s/ Jeffrey A. Cogan Jeffrey A. Cogan, Esq. 10 Nevada Bar No.: 4569 1057 Whitney Ranch Drive, Suite 350 11 Henderson, Nevada 89014 Telephone: (702) 474-4220 12 Facsimile: (702) 44-4228 Email: jeffrey@jeffreycogan.com 13 14 WILENCHIK & BARTNESS /s/ Jack D. Wilenchik 15 Jack D. Wilenchik, Esq. Arizona Bar No.: 029353 16 Pro Hac Vice Not Yet Filed 17 Ross Meyer, Esq. Arizona Bar No.: 028473 18 Pro Hac Vice Not Yet Filed 19 The Wilenchik & Bartness Building 20 2810 North Third Street Phoenix, Arizona 85004 21 Telephone: 602-606-2810 Facsimile: 602-606-2811 22 Ross Meyer - rossm@wb-law.com 23 Jack Wilenchik - Jack W@wb-law.com 24 Attorneys for Defendant Arnaldo Trabucco, M.D. 25 26 27 28

Case 2:21-cv-02087-APG-EJY Document 27 Filed 01/21/22 Page 3 of 3 KEMP & KEMP, ATTORNEYS AT LAW /s/ Victoria L. Neal Victoria L. Neal, Esq. Nevada Bar No.: 13382 Kemp & Kemp, Attorneys at Law 7435 W. Azure Drive, Suite 110 Las Vegas, NV 89130 Attorney for Defendant Arnaldo Trabucco, M.D. **ORDER** ITAS SO ORDERED: January 21, 2022 DATED: